

MEMO ENDORSED

PETER J. SCHAFFER
ATTORNEY AT LAW
184 EAST 161ST STREET
BRONX, NEW YORK 10451

TEL: (718) 585-4444
FAX: (718) 585-4446

Via ECF Only

October 11, 2021

Hon. Nelson S. Roman
United States District Judge
United States Courthouse
300 Quarropas Street
White Plains, NY 10601

Re: United States v. Nachman Helbran
19 CR 497 (NSR) -01

Dear Judge Roman:

I was appointed along with Bruce D. Koffsky as standby counsel to *pro se* defendant Nachman Helbrans. This case is scheduled for a final Pretrial conference on October 13, 2021 and jury selection to commence October 18, 2021. I respectfully request the Court grant an Order allowing me to bring one laptop computer and external hard drive into the Courthouse for use during the trial.

The discovery material in this case is voluminous and is contained in thousands of files turned over by Government counsel to the defense. I require the use of "General Purpose Computing Devices", in this case a laptop computer and external hard drives.

I therefore respectfully request that the Court enter an Order allowing me to bring one laptop computer and external hard drive into the Courthouse for use during the trial. Attached to this letter application is a proposed order.

Thank you for consideration of the above.

USDC SDNY
DOCUMENT
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DATE FILED: 10/12/2021

Very truly yours,

/s/

Peter J. Schaffer

cc: All parties (via ECF only)